

FILED
6/26/2025
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

JUDGE SHAH
MAGISTRATE JUDGE GILBERT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

No. 24 CR 77

v.

CORTEZ FLEMING and
JULIAN VENERABLE

Violation: Title 18, United States
Code, Sections 922(g)(1) and
922(a)(1)(A)

SUPERSEDING INDICTMENT
UNDER SEAL

COUNT ONE

The SPECIAL JUNE 2024 GRAND JURY charges:

On or about February 9, 2024, at South Holland, in the Northern District of
Illinois, Eastern Division,

CORTEZ FLEMING

defendant herein, knowing that he had previously been convicted of a crime
punishable by a term of imprisonment exceeding one year, did knowingly possess, in
and affecting interstate commerce, a firearm, namely an ABC Rifle Company, model
ABC-15, .300 blackout caliber pistol, bearing serial number 77-12907; an ABC Rifle
Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-
12908; an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing
serial number 77-12910; an ABC Rifle Company, model ABC-15, .300 blackout caliber
pistol, bearing serial number 77-12613; and an ABC Rifle Company, model ABC-15,
.300 blackout caliber pistol, bearing serial number 77-12647, which firearm had
traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

The SPECIAL JUNE 2024 GRAND JURY further charges:

Between on or about January 31, 2024, through on or about February 9, 2024, at South Holland, in the Northern District of Illinois, Eastern Division, and elsewhere,

JULIAN VENERABLE

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-12907; an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-12908; an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-12910; an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-12613; and an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-12647, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

The SPECIAL JUNE 2024 GRAND JURY further charges:

Beginning on or about November 2023 and continuing until approximately February 9, 2024, at South Holland, in the Northern District of Illinois, Eastern Division, and elsewhere,

CORTEZ FLEMING and
JULIAN VENERABLE,

defendants herein, each not being a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, did unlawfully engage in the business of dealing in firearms;

In violation of Title 18, United States Code, Section 922(a)(1)(A).

FORFEITURE ALLEGATION

The SPECIAL JUNE 2024 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as set forth in this Superseding Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to:

a. an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-12907, and associated ammunition;

b. an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-12908, and associated ammunition;

c. an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-12910, and associated ammunition;

d. an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-12613, and associated ammunition; and

e. an ABC Rifle Company, model ABC-15, .300 blackout caliber pistol, bearing serial number 77-12647, and associated ammunition.

A TRUE BILL:

Andrew S. Boutros by SME
UNITED STATES ATTORNEY

FOREPERSON